# EXHIBIT 20



January 21, 2025

#### VIA EMAIL -- Hanley.W.Gibbons@usdoj.gov

Hanley W. Gibbons Trial Attorney U.S. Department of Justice Environmental Torts Litigation

Re: In re Camp Lejeune – Expert Reliance Materials – Dr. Kyle Longley

Counsel,

This letter is both an amendment to PLG's deficiency response letter dated January 16, 2025, and a supplement to Dr. Kyle Longley's reliance materials for his January 13, 2025 rebuttal report.

As you know, Dr. Longley issued two reports; his initial expert historian report dated December 7, 2024; and his rebuttal report dated January 13, 2025 (which addressed the report by Defendant's expert historian Dr. Brigham).

PLG provided a reliance list with 198 items for his December 7, 2024 report and a second reliance list with 36 items for his January 13, 2025 rebuttal report. PLG has also produced information and materials listed in those reliance lists such as the "water babies" video footage. (*See* Item 154 on first reliance list, BATES CL\_PLG-EXPERT\_LONGLEY\_0000000009 - 10).

Over the weekend, Dr. Longley did locate some notes from his call with Allan Howard dated August 30, 2024, which amends item 127 on the reliance list for the December 7, 2024 report. In that regard, item 127 in Table 1 that was sent on January 16, 2025 is hereby amended and attached to this letter as Amended Tab 1. (*See* CL\_PLG-EXPERT\_LONGLEY\_0000000014).

Also being produced are Dr. Longley's call notes from conversations with Mike Partain and Jerry Ensminger dated January 7, 2025, and an email to Dr. Longley dated January 14, 2025, previously listed as items 2 and 3 in the reliance list for Dr. Longley's January 13, 2025 rebuttal report. (See CL\_PLG-EXPERT\_LONGLEY\_0000000011 – 13 and CL\_PLG-EXPERT\_LONGLEY\_0000000015 -16).

The aforementioned files have been uploaded to the Parties' shared  $\operatorname{CL}$  - Plaintiffs' Productions folder on JEFS.

Respectfully, Bell Legal Group

J Edward Bell

Ed Bell

Attachment: As stated (Amended Table 1)

Reliance List No.	Document	Deficiency / Solution
2	"Average Price of a Car in 1965," Worldmetrics, July 24, 2024, https://worldmetrics.org/average-cost-of-a-car-in-1965/.	<u>Deficiency</u> : The link no longer works for Worldmetrics. <u>Solution</u> : Original cite was to: "Average Price of a Car in 1965," <i>Worldmetrics</i> , July 24, 2024, https://worldmetrics.org/average-cost-of-a-car-in-1965/ [accessed 27 September 2024]. Cite was to support this sentence: "The average price of a car in the 1960s was \$2,650 with additional costs, including \$50/month for insurance, maintenance, and gasoline." A check on the Internet Wayback Machine reflects the Worldmetrics site went offline at the end of 2024.¹ Accordingly, please see these substitute sources: Micheline Maynard, 'Mad Men' And The Glory Of Mid-1960s Cars, Forbes, March 22, 2012 (in 1960s "[t]he average new vehicle cost \$2,650").² See also US Department of Energy, Fact #741: August 20, 2012 Historical Gasoline Prices, 1929-2011 (stating that Average Annual Retail Price of Gasoline for 1965 was 30 cents/gallon).³
9	The Camp Lejeune Globe, Camp Lejeune, N.C., 2 Aug. 1944.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>4</sup>
11	The Camp Lejeune Globe, Camp Lejeune, N.C., 24 April 1952.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>5</sup>
12	The Camp Lejeune Globe, Camp Lejeune, N.C., 26 June 1952.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>6</sup>
14	The Camp Lejeune Globe, Camp Lejeune, N.C., 8 Oct. 1953.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>7</sup>
15	The Camp Lejeune Globe, Camp Lejeune, N.C., 3 May 1957.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>8</sup>

<sup>&</sup>lt;sup>1</sup> https://web.archive.org/web/20241015000000\*/https://worldmetrics.org.

 $<sup>^2 \</sup>frac{\text{https://www.forbes.com/sites/michelinemaynard/2012/03/22/mad-men-and-the-glory-of-mid-1960s-cars/\#:~:text=The\%20average\%20new\%20vehicle\%20cost,assembly\%20line\%20in%20the\%20afternoon.}$ 

<sup>&</sup>lt;sup>3</sup> https://www.energy.gov/eere/vehicles/fact-741-august-20-2012-historical-gasoline-prices-1929-2011.

<sup>4</sup> https://digital.ncdcr.gov/documents/detail/463294?item=463303.

<sup>&</sup>lt;sup>5</sup> https://www.dvidshub.net/publication/issues/62695.

<sup>&</sup>lt;sup>6</sup> https://www.dvidshub.net/publication/issues/62686.

<sup>7</sup> https://www.dvidshub.net/publication/issues/62598.

<sup>&</sup>lt;sup>8</sup> https://www.dvidshub.net/publication/issues/62383.

16	The Camp Lejeune Globe, Camp Lejeune, N.C., 10 May 1957.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>9</sup>
17	The Camp Lejeune Globe, Camp Lejeune, N.C., 19 May 1960.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>10</sup>
19	The Camp Lejeune Globe, Camp Lejeune, N.C., Photo, Tarawa Terrace II Track Meet, 8 Feb. 1962.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>11</sup>
20	The Camp Lejeune Globe, Camp Lejeune, N.C., 14 Feb. 1963.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>12</sup>
21	The Camp Lejeune Globe, Camp Lejeune, N.C., 11 July 1963.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>13</sup>
23	The Camp Lejeune Globe, Camp Lejeune, N.C., 6 Jan. 1966.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>14</sup>
24	The Camp Lejeune Globe, Camp Lejeune, N.C., 19 May 1966.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>15</sup>
25	The Camp Lejeune Globe, Camp Lejeune, N.C., 25 Aug. 1966.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>16</sup>
26	The Camp Lejeune Globe, Camp Lejeune, N.C., 9 March 1967.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>17</sup>
27	The Camp Lejeune Globe, Camp Lejeune, N.C., 28 July 1967.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>18</sup>
28	The Camp Lejeune Globe, Camp Lejeune, N.C., 31 Jan. 1969.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>19</sup>

<sup>&</sup>lt;sup>9</sup> https://www.dvidshub.net/publication/issues/62384.

<sup>&</sup>lt;sup>10</sup> https://www.dvidshub.net/publication/issues/61960.

<sup>11</sup> https://www.dvidshub.net/publication/issues/61701.

<sup>12</sup> https://www.dvidshub.net/publication/issues/61568.

https://www.dvidshub.net/publication/issues/61497.

https://www.dvidshub.net/publication/issues/61213.

https://www.dvidshub.net/publication/issues/61213.
 https://www.dvidshub.net/publication/issues/61193.

<sup>16</sup> https://www.dvidshub.net/publication/issues/61180.

https://www.dvidshub.net/publication/issues/61119.
 https://www.dvidshub.net/publication/issues/61119.

<sup>18</sup> https://www.dvidshub.net/publication/issues/61098.

<sup>&</sup>lt;sup>19</sup> https://www.dvidshub.net/publication/issues/60926.

29	The Camp Lejeune Globe, Camp Lejeune, N.C., 2 Jan. 1970.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>20</sup>
30	The Camp Lejeune Globe, Camp Lejeune, N.C., 6 Feb. 1970.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>21</sup>
31	The Camp Lejeune Globe, Camp Lejeune, N.C., 2 July 1970.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>22</sup>
35	The Camp Lejeune Globe, Camp Lejeune, N.C., 18 July 1974.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>23</sup>
37	The Camp Lejeune Globe, Camp Lejeune, N.C., 4 May 1977.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : It appears this citation in the reliance list was mistaken.
38	The Camp Lejeune Globe, Camp Lejeune, N.C., 9 June 1977.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>24</sup>
39	The Camp Lejeune Globe, Camp Lejeune, N.C., 16 June 1977.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>25</sup>
40	The Camp Lejeune Globe, Camp Lejeune, N.C., 30 June 1977.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>26</sup>
41	The Camp Lejeune Globe, Camp Lejeune, N.C., 8 Sept. 1977.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>27</sup>
42	The Camp Lejeune Globe, Camp Lejeune, N.C., 15 Sept. 1977.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>28</sup>
43	The Camp Lejeune Globe, Camp Lejeune, N.C., 29 Sept. 1977.	<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>29</sup>
44	The Camp Lejeune Globe, Camp Lejeune, N.C., 6 Oct. 1977.	<u>Deficiency</u> : No bates number provided.

<sup>&</sup>lt;sup>20</sup> https://www.dvidshub.net/publication/issues/60811.

<sup>21</sup> https://www.dvidshub.net/publication/issues/60806.

<sup>22</sup> https://www.dvidshub.net/publication/issues/60785.

<sup>23</sup> https://www.dvidshub.net/publication/issues/60294.

<sup>24</sup> https://www.dvidshub.net/publication/issues/60113.

<sup>25</sup> https://www.dvidshub.net/publication/issues/60112.

<sup>26</sup> https://www.dvidshub.net/publication/issues/60110.

<sup>27</sup> https://www.dvidshub.net/publication/issues/60100.

<sup>28</sup> https://www.dvidshub.net/publication/issues/60099.

<sup>&</sup>lt;sup>29</sup> https://www.dvidshub.net/publication/issues/60097.

		Solution: Document is publicly available online.30
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45		<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>31</sup>	
46		Deficiency: No bates number provided.  Solution: Document is publicly available online.32	
49		<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>33</sup>	
50		<u>Deficiency</u> : No bates number provided. e <u>Solution</u> : Document is publicly available online. <sup>34</sup>	
51			
52	The Camp Lejeune Globe, Camp Lejeune, N.C., 2 July 1981.  Deficiency: No bates number provided. Solution: Document is publicly available online.36		
53	The Camp Lejeune Globe, Camp Lejeune, N.C., 24 June 1982.  Deficiency: No bates number provided. Solution: Document is publicly available online. <sup>37</sup>		
54		<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>38</sup>	

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<sup>30</sup> https://www.dvidshub.net/publication/issues/60096.

https://www.dvidshub.net/publication/issues/60047.

<sup>32</sup> https://www.dvidshub.net/publication/issues/59993.

<sup>33</sup> https://www.dvidshub.net/publication/issues/59691.

https://www.dvidshub.net/publication/issues/59564. https://www.dvidshub.net/publication/issues/59562.

<sup>36</sup> https://www.dvidshub.net/publication/issues/59560.

<sup>37</sup> https://www.dvidshub.net/publication/issues/59412.

<sup>38</sup> https://www.dvidshub.net/publication/issues/64474.

55		Deficiency: No bates number provided. Solution: Document is publicly available online. <sup>39</sup>	
56		Deficiency: No bates number provided.  Solution: Document is publicly available online.40	
57		Deficiency: No bates number provided.  Solution: Document is publicly available online.41	
The Camp Lejeune Globe, Camp Lejeune, N.C., 8 May 1986.  Deficiency: No bates number provided. Solution: Document is publicly available online.42			
60		Deficiency: No bates number provided. Solution: Document is publicly available online.43	
61		<u>Deficiency</u> : No bates number provided. <u>Solution</u> : Document is publicly available online. <sup>44</sup>	
62	The Camp Lejeune Globe, Camp Lejeune, N.C., 19 July 1990.  Deficiency: No bates number provided. Solution: Document is publicly available online.45		
107	Email from Charity Delaney to Deficiency: No bates number provided.  Jason Saunter, 20 Aug. 2014. Solution: We have this supplemental information: Document: Aug 20 2014 reference FW ATSDR requests for CL voc exposure pathways (ATSDR info_req_062514-1).msg. Bates: CLJA_ATSDR_8RFP_0000000029-30.		
108	Email from Charity Delaney to Deficiency: No bates number provided.  Jason Sautner (ATSDR), 24  July 2014.  Deficiency: No bates number provided.  Solution: Document: 23-01054 Item 8.pdf. Bates: CLJA_ATSDR_8RFP_0000000003.		

<sup>&</sup>lt;sup>39</sup> https://www.dvidshub.net/publication/issues/59309.

<sup>40</sup> https://www.dvidshub.net/publication/issues/59243.

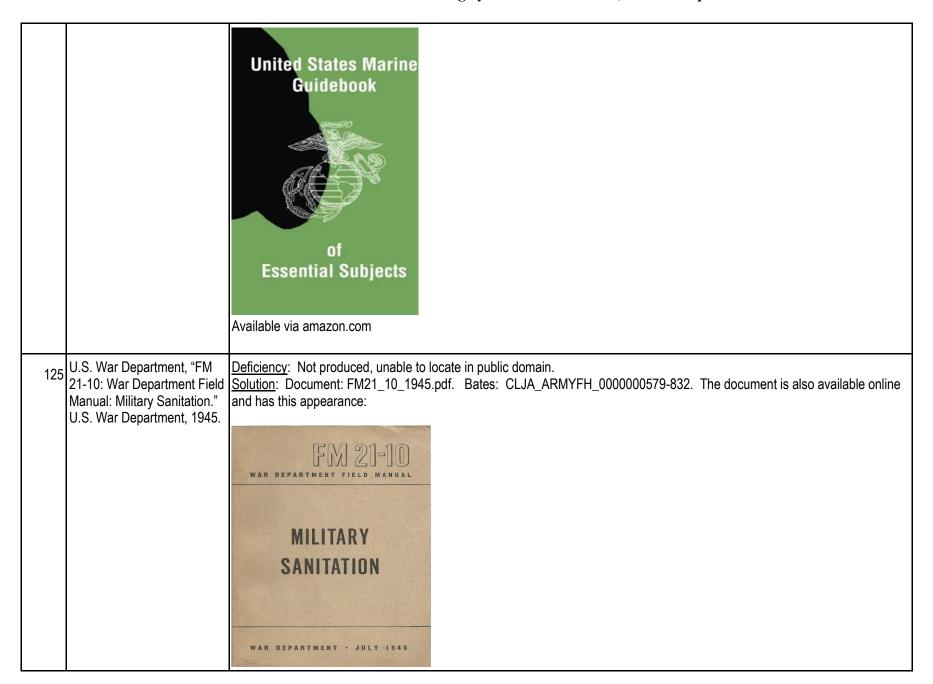
https://www.dvidshub.net/publication/issues/58868. https://www.dvidshub.net/publication/issues/58864.

<sup>43</sup> https://www.dvidshub.net/publication/issues/58564.

<sup>44</sup> https://www.dvidshub.net/publication/issues/63699.

<sup>45</sup> https://www.dvidshub.net/publication/issues/58041.

	Marines Reference Collection, 5958, A/33/K/3/3 Box 3 of 6.	Deficiency: Not produced, unable to identify source. Solution: The author states that John Lyles, head of the reference center, can provide more information as these are readily available vis-à-vis the finding aid and in the archives themselves. Further, it is noted that the sentence that this cited reference is supporting states: "It was a period of challenges and unrest on bases including Camp Lejeune, as race riots swept the base in July 1969, reflecting divisions in society boiling over during that historical period." For that we suggest the following substitute cites if accessing the primary document proves too difficult: E.g., see Wikipedia entry: "The Camp Lejeune incident refers to the outbreak of hostilities between black and white enlisted Marines at an NCO Club near the United States Marine Corps' Camp Lejeune in North Carolina, on the evening of July 20, 1969. It left a total of 15 Marines injured, and one, Corporal Edward E. Blankston, dead. It was subsequently investigated by the military and led to widespread changes in military race relations and policy." Available online at <a href="https://en.wikipedia.org/wiki/Camp Lejeune incident">https://en.wikipedia.org/wiki/Camp Lejeune incident</a> (last accessed Jan. 14, 2025).
119	• •	<u>Deficiency</u> : Not a valid bates number. <u>Solution</u> : Document: M67001_000367.pdf. Bates: CLJA_LANTDIV-0000041587-41657.
Essential Subjects," U.S. Marine Corps Institute, 1983.  Vigorous and progressive physical training results in an increase in work pride.' The manual argued that cardiovascular training, with a focus on combined with strength work to manipulate, at the minimum, the weigh march long distances with heavy loads or to work long hours and still n		Solution: The citation was to support the following text: "A Marine manual emphasized something similar: 'A program of regular, vigorous and progressive physical training results in an increase in work efficiency, self-confidence, and personal as well as unit pride.' The manual argued that cardiovascular training, with a focus on stamina for 'prolonged activity of a moderate tempo,' combined with strength work to manipulate, at the minimum, the weight of the individual ensured longer lives and the 'ability to march long distances with heavy loads or to work long hours and still maintain the reserve to carry on in an emergency." To the extent the 1983 document is not available, the facts can be corroborated by oral historians e.g. Ensminger and Partain. The



		Available via amazon.com	
126	Wilber, Kendrick, Workman & Warren, Inc., "Fast Food Conceptual Study for Enlisted Dining Facilities: Marine Corps Base, Camp Lejeune, North Carolina," 3 June 1985, 13.		able to locate in public domain. 001101-071-001.pdf. Bates: CLJA_WATERMODELING_07-0001287808-1288076.
127	Howard, Allan. Oral History by author via Zoom, 30 Aug. 2024.	Deficiency: Not produced Solution:. CL_PLG-EXPERT_L locate some notes from his Zon	ONGLEY_000000014. In addition to writing information directly into his report, Dr. Longley did om with Mr. Howard.
October 1971, U.S. Marine Corps Film Repository, Research Collections, Univ. of South Carolina.  The control of South Carolina of South Ca		Solution: If the media related note that other documented progressive that other documented proceedings and the second that other documented proceedings at the second to visit Camp Lejeun additional troops conduct an all somber, dreary fall day in 1983 bombing of Marine Corps barra office, The Daily News, Sept. 4	to the Nixon visit are not readily available, we can withdraw any reference to the Nixon visit. We esidential visits to the base included: "Franklin D. Roosevelt - Dec. 18, 1944. Franklin D. S. president to visit Marine Corps Base Camp Lejeune just months before his death from a e of 63 John F. Kennedy - April 14, 1962. John F. Kennedy became the second U.S. e when in 1962 he observed units of 2nd Marine Division, 2nd Marine Aircraft Wing and apphibious landing demonstration at Onslow Beach. Ronald Reagan - Nov. 4, 1983. On a great Reagan attended a memorial service remembering the lives lost in the Oct. 23, 1983 acks in Beirut, Lebanon. Calvin Shomaker, U.S. Presidents who visited Camp Lejeune while in 14, 2020, available at <a href="https://www.jdnews.com/news/u-s-presidents-who-visited-camp-lejeune-1-67f4-5dfc-8ed4-366617b67731.html">https://www.jdnews.com/news/u-s-presidents-who-visited-camp-lejeune-1-67f4-5dfc-8ed4-366617b67731.html</a> (last accessed Jan. 14, 2025).
	145 U.S. Marine Corps, Pho P&S: Camp Lejeune, No Marines Archive, Quanti	C-CLNC/POW School, U.S.	<u>Deficiency</u> : Not produced, unable to identify source. <u>Solution</u> : The citation was for this sentence: "Many received training on how to behave if captured, a problem dating back to the Korean War." We hereby withdraw the sentence, as in any event it is not necessary to the report.
	148 Oral history, Retired Master Sergeant Jerry Ensminger		<u>Deficiency</u> : Not produced. <u>Solution</u> : Dr. Longley spoke with Retired Master Sergeant Jerry Ensminger and wrote the information directly into his report.
	154 Water babies videos.		<u>Deficiency</u> : Not produced, unable to identify source. <u>Solution</u> : BATES CL_PLG-EXPERT_LONGLEY_0000000009 – 10. PLG provided to DOJ a copy of the "water babies" video footage on January 16, 2025.

[155] Not Identified		<u>Deficiency</u> : No source or bates provided. Solution: The blisters image is on page 6 of this Globe issue: The Globe, Camp Lejeune, N.C.,
		Vol. 17, No. 42, Oct. 19, 1961, Bates
	·	00897_PLG_0000048348 to 48359. Available also at
		https://www.dvidshub.net/publication/issues/61746 (last accessed Jan. 14, 2025).